



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 27, 2017

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2017 ETC Annual Report of Union River Telephone Company  
Study Area Code 100027**

Dear Ms. Dortch:

On behalf of Union River Telephone Company ("Union River"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	David Pelletier
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	dpelletier@rivah.net
	Form Type	54.313 and 54.422

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<210> For the prior calendar year, were there any reportable voice service outages? No

Page 2

<b>(300) Unfulfilled Service Request</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<300> Unfulfilled service request (voice)

0
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<310> Detail on attempts (voice)

--

Name of Attached Document

<320> Unfulfilled service request (broadband)

0
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<330> Detail on attempts (broadband)

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Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

<b>(500) Compliance With Service Quality Standards and Consumer Protection Rules</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
100027ME510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations Data Collection Form</b>	<b>REDACTED FOR PUBLIC INSPECTION</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	100027ME610.pdf





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<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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[illegible]

## Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<810>	Reporting Carrier	Union River Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Union River Telephone Company

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 100027ME1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 100027ME1030.pdf

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

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<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP [www.rivah.net/Basic%20Service%20Summary.pdf](http://www.rivah.net/Basic%20Service%20Summary.pdf)

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input style="width: 100px; height: 20px;" type="text"/>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2024A>	Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 200px; height: 60px;" type="text"/>
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2025A>	Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 200px; height: 60px;" type="text"/>
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	<input style="width: 100px; height: 20px;" type="text"/>	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input style="width: 100px; height: 20px;" type="text"/>	

**(2005) Price Cap Carrier Additional Documentation**

**Data Collection Form**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

<2016> Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)



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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		100027ME3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	100027ME3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

**REDACTED FOR PUBLIC INSPECTION**

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

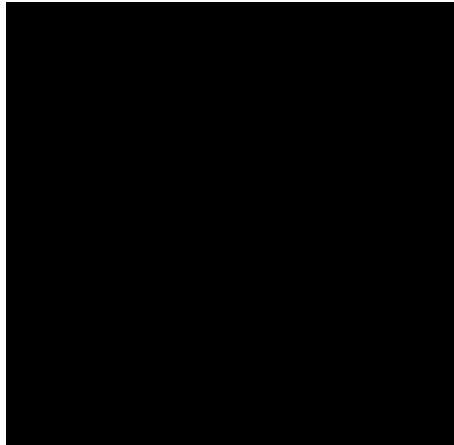
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



<b>(4005) Rural Broadband Experiment Additional Documentation</b> <b>Data Collection Form</b>	<b>FCC Form 481</b> <b>OMB Control No. 3060-0986/OMB Control No. 3060-0819</b> <b>July 2013</b>
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<010>	Study Area Code	100027
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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

<b>4003b.</b> Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
---	--	--

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

<b>4004a.</b> Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
--	--	--

<b>4004b.</b> Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: UNION RIVER TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/26/2017
Printed name of Authorized Officer: William Silsby jr	
Title or position of Authorized Officer: President/General Manager	
Telephone number of Authorized Officer: 2075849911 ext.	
Study Area Code of Reporting Carrier: 100027	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net

[illegible]



REDACTED FOR PUBLIC INSPECTION

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	100027
<015>	Study Area Name	UNION RIVER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	David Pelletier
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075849950 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dpelletier@rivah.net
<810>	Reporting Carrier	Union River Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Union River Telephone Company

[illegible]

**Section 1: Certification of Officer**

Section 54.313(a)(5) and Section 54.422(b)(3), of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding its Service Quality Standards and Consumer Protection Rules Compliance.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company meets the Service Quality Standards and Consumer Protection Rules of the Maine Public Utilities Commission and that the statements made herein are accurate:

**Name of Officer (Print):** William S. Silsby, Jr.

**Title:** President/General Manager

**Signature:** 

**Date:** June 23, 2017

## **Section 2: Description of Service Quality Standards and Consumer Protection Rules Compliance**

Under Maine Revised Statute Title 35-A, Chapter 72: Telecommunications Regulatory Reform, a framework has been put in place that is designed to reflect the goals of 47 CFR § 54.313(a)(5) and 47 CFR § 54.422(b)(3). As a result of that framework that has been put in place, the Maine Public Utilities Commission operating under the Code of Maine Rules 65-407, Chapter 201 which became effective July 27, 2014, established a set of metrics and benchmarks that we as a Provider of Last Resort are expected to meet and that are reported on quarterly. Failure to meet the benchmarks, subject carriers to the potential for financial sanctions pending an investigation by the Commission. Prior to the provisional adoption of Chapter 201, ETCs in Maine had been reporting on these same metrics for a number of years.

The Maine Public Utilities Commission through the Code of Maine Rules 65-407, Chapter 290 has in place a consumer protection structure to regulate ETCs offering Provider of Last Resort service. These Standards for Billing, Credit and Collection, and Customer Information are designed to provide consumers adequate and timely information, prevent discrimination, ensure reasonable access to service and establish a set of consumer protection standards. For any disputes that may arise, the Consumer Assistance Division of the Maine Public Utilities Commission is available to assist consumers and ETCs with the resolution process. The consumer protection rules require the preparation of an annual report summarizing various measurable items included in the Chapter.

**Section 1: Certification of Officer**

Section 54.313(a)(6) and Section 54.422(b)(4), as set forth in Section 54.202(a)(2) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding its ability to function in emergency situations.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company is able to remain functional in emergency situations and that the statements made in this herein are accurate:

**Name of Officer (Print):** William S. Silsby, Jr.

**Title:** President/General Manager

**Signature:** 

**Date:** June 23, 2017

## **Section 2: Description of Functionality in Emergency Situations**

The Company has equipped each of its Central Office locations, its Headquarters building, and remote equipment sites with fixed standby generators. The Company also owns portable generators to provide backup to fixed units at remote equipment sites.

The Company has a fiber optic ring serving equipment that provides service to approximately 86% of its customers. Due to the geography of the area, the remaining 14% of customers cannot be served by a diverse route. The Company also has diverse routing to the Point of Connection, however, the connecting company does not provide a diverse route from the Point of Connection to their connecting office. The Company has contacted the connecting company with a proposal to provide a diverse route from the point of connection to the connecting office.

The Company can monitor traffic and has the ability to manage such traffic up to the limits imposed by the quantity of facilities in service at the time of an emergency.



**Section 1: Certification of Officer**

Section 54.313(a)(10) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding Voice Services Rate Comparability.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company's pricing of voice services is no more than two standard deviations above the applicable national average urban rate for voice service and that the statements made herein are accurate:

**Name of Officer (Print):** William S. Silsby, Jr.

**Title:** President/General Manager

**Signature:** 

**Date:** June 23, 2017

## **Section 2: Description of Voice Service Rate Comparability**

The Company offers the following description as to how the pricing of its voice services is no more than two deviations above the applicable national average urban rate for voice service. As per Public Notice DA 17-167, the Wireline Competition Bureau announced the results of the 2017 Urban Rate Survey for fixed voice services is to be \$22.49, thus a carrier receiving High Cost Program support must certify that its local rate and state fees is below \$49.51.

Consistent with Data Line 700, Company Voice Telephony Service Price Offerings, completed in accordance with 47 CFR § 54.313(a)(7), the Company offers two flat rate options in each of its exchanges based on local calling area. The flat rated Residential Local Service Rate plus state fees yields exchange charges per line of \$17.95 and \$19.48, which are well below \$49.51.

**Section 1: Certification of Officer**

Section 54.313(a)(12) of the rules of the Federal Communications Commission ("FCC") requires **Union River Telephone Company** ("The Company") SAC 100027 to provide information regarding Broadband Services Rate Comparability.

I, William S. Silsby, Jr., am an officer of Union River Telephone Company and hereby certify that The Company's pricing of broadband services falls within the applicable national average urban benchmark rate for broadband service and that the statements made herein are accurate:

**Name of Officer (Print):** William S. Silsby, Jr.

**Title:** President/General Manager

**Signature:**

William S. Silsby Jr.

**Date:** June 23, 2017



## **Section 2: Description of Broadband Service Rate Comparability**

The Company offers the following description as to how the pricing of its broadband services is at or below the relevant reasonable comparability benchmark service. As per Public Notice DA 16-362, the Wireline Competition Bureau announced the results of the 2017 Urban Rate Survey for fixed voice and broadband services. Based on the criteria with a download speed of 10Mbps and an upload speed of 1 Mbps with an unlimited usage allowance, thus a carrier receiving High Cost Program support must certify that its broadband service is at or below \$77.98.

Consistent with Data Line 710, Company Broadband Price Offerings, completed in accordance with 47 CFR § 54.313(a)(7), the Company offers a plan with a download speed of 10Mbps and an upload speed of 1 Mbps with an unlimited usage allowance at a monthly rate of \$59.95. Based on this plan offering, the Company falls well below the benchmark of \$77.98.

**Union River Telephone Company (SAC 100027)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Union River Telephone Company hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**